

December 22, 2022

Dr. Cheryl Laskowski,  
Branch Chief, Low Carbon Fuel Standard Team  
California Air Resources Board

Submitted via LCFS Comments Upload Link

RE: Request to standardize low carbon fuel regulation rotation requirements

Dear Dr. Laskowski:

Thank you for the opportunity to comment on the California Air Resources Board's (CARB) public workshop on Potential Changes to the Low Carbon Fuel Standard (LCFS).

SCS Global Services (SCS) is a global leader in third-party certification, auditing, testing services, and standards. Established as an independent third-party certification firm in 1984, our goal is to recognize the highest levels of performance in environmental protection and social responsibility in the private and public sectors, and to stimulate continuous improvement in sustainable development.

SCS has achieved numerous accreditations and approvals, including but not limited to:

- By the California Air Resources Board (CARB) for:
  - Low Carbon Fuel Standard;
  - Mandatory Reporting Program;
  - Compliance Offsets Program
- By the American National Accreditation Board (ANAB) to ISO 14065 and 14064-3 for:
  - The Climate Registry (TCR), General Verification Protocol;
  - Verified Carbon Standard (VCS);
  - Climate Action Reserve (CAR), Forest Verification Protocol;
  - The American Carbon Registry;
  - Carbon Offsetting and Reduction Scheme for International Aviation (CORSA)
- The Massachusetts Greenhouse Gas Emissions Reporting Program (MassDEP)
- CDP (formerly Carbon Disclosure Project)

- World Resources Institute Greenhouse Gas Protocol
- Airport Carbon Accreditation (ACA)

The SCS Greenhouse Gas Verification Program was established in 2008, and to date the program has verified emissions from a wide range of industries including manufacturing, electricity generation facilities, transportation, oil and gas, glass manufacturing, and municipalities utilizing a variety of reporting protocols.

Specific to LCFS, the low carbon fuel programs that are being adopted in multiple jurisdictions each set high professional standards for the acceptance of auditors and verification bodies. The unique needs of these programs necessitate significant investment in qualified personnel and training.

California's success is having an impact. Other jurisdictions are now adopting similar GHG reduction strategies and regulations specific to transportation fuels. SCS is requesting that CARB take this rulemaking period to consider the impacts of standardizing verification body and auditor requirements that will enable the proper professional development and investment to meet these rapidly growing needs. Standardization creates efficiencies that allow for sharing expertise and resources. This, in turn, creates costs savings and serves to enable other jurisdictions to adopt similar regulations and have a much larger impact on the reduction of transportation GHG emissions.

As an accredited certification and verification body, SCS's work is subject to multiple layers of oversight, namely:

- Internal and witness audits performed by the dedicated Quality Assurance department overseeing compliance with a wide range of requirements, including ISO 14065, ISO 17065, and ISO 17021;
- Annual office and witness audits by the accreditation body;
- Desk reviews and witness audits by various scheme owners

Having extensive experience with a variety of standards, SCS understands and appreciates the value of auditor rotation as a tool for ensuring integrity of verification. The low carbon program schemes that we work with, such as the EU's Renewable Energy Directive, Canada's Clean Fuel Standard, and the Brazilian National Biofuel Policy (RenovaBio) have introduced auditor rotation

requirements. These requirements, however, are limited to rotation of individual auditors within a verification body. This approach allows to both assure independence of verification and preserve the investment in the allocated resources.

Therefore, SCS is suggesting that CARB adopt a policy that enables qualified verification bodies to audit clients beyond six years if the following conditions are met:

- verification body maintains an accreditation or approval by an oversight body (e.g., an accreditation body or a standard owner)
- verification body maintains an internal quality management system, including internal audits
- results of external and internal audits are made available to CARB upon request
- verification body fulfills rotation requirements for individual auditors at a frequency as determined appropriate by CARB

The recognition of existing accreditation standards to maintain verification body integrity and independence is necessary to enable the auditing community to invest in the professional development of organizations and staff to meet rapidly growing market needs in the very technically complex industry of low carbon fuels. It is because of the unique aspects of the international expansion of low carbon fuel policies that CARB should consider limiting the rotation rules of LCFS to the rotation of individual auditors rather than verification bodies.

Thank you for the opportunity to comment on the CARB workshops. We look forward to our continued participation in this program and supporting its growth and significant impact on reducing transportation fuel emissions.

Respectfully,



Scott Coye-Huhn  
Director, Low Carbon Fuel Regulations